

# **EXHIBIT BF**

CLERK OF THE  
SUPERIOR COURT  
FILED

D. Garcia DEP

2020 AUG -7 PM 4: 04

MARK BRNOVICH  
Attorney General

JANNA L. JOHNSON  
Assistant Attorney General  
State Bar No. 030792  
CFP/PSS  
120 W. 1st Avenue, 2nd Floor  
Mesa, Arizona 85210  
Telephone: (602) 771-4000  
PSSSef@azag.gov

Attorneys for the Department of Child Safety

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In the Matter of:

No. JD532206

DY  
d.o.b  
K  
d.o.b. l

**DCS'S MOTION FOR CHANGE IN  
PHYSICAL CUSTODY OF D  
and K  
O AHMET  
KAHRAMAN**

Person(s) under 18 years of age.

(Honorable Cassie Woo)

The Department of Child Safety (DCS or the Department), by and through undersigned counsel, hereby requests an order that the children remain wards of the Court in the legal care, custody and control of the DCS; and that the children be placed in the physical custody of AHMET KAHRAMAN, the father. This placement is the least restrictive consistent with the best interests of the children.

AHMET KAHRAMAN is prohibited from removing the children from the State of Arizona except with DCS's consent.

1 IT IS FURTHER requested that the Court find that there is no substantial risk of  
2 harm to the child/children's mental, physical, or emotional health and safety if returned  
3 to parent(s) care.  
4

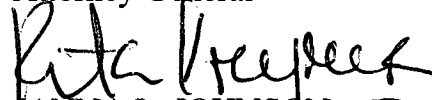

5 IT IS FURTHER requested that the Foster Care Review Board (FCRB) be  
6 relieved of further responsibility in this case regarding the children.

7 The reasons for this motion are set out in the attached report to the Court, dated  
8 August 4, 2020.  
9

10 Under Arizona Rules of Procedure for the Juvenile Court, 46(A), all counsel  
11 have been notified of this Motion. Rachel Metelits, Esq., Attorney for Father, is in  
12 agreement. Kinda Johnson-Hurd, Esq., Guardian Ad Litem for the Children, has no  
13 objection. DeeAn Gillespie Strub, Esq., Attorney for Mother, has not responded as of  
14 this date.  
15

16 RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of August, 2020.

17 MARK BRNOVICH  
18 Attorney General

19   
20 JANNA L. JOHNSON   
21 Assistant Attorney General  
22  
23  
24  
25  
26  
27  
28

**Addendum Report To Juvenile Court**

**Maricopa County**

**Dated: 8/4/20**

**Court Case Number: JD532206**

**I. PRESENT SITUATION:**

Mr. Kahraman is currently participating in unsupervised overnight visits with his children. Mr. Kahraman successfully transitioned from therapeutic visitation with Southwest Human Development to parent aide services. While in parent aide services, he has successfully enhanced the following capacities: Controls impulses, takes actions; sets aside own needs for child, self-aware, recognizes threats, recognizes child's needs, understand protective role, plans and articulates plans for protection and meets own emotional needs. Mr. Kahraman successfully closed from parent aide services on 07/30/2020. As of 07/28/2020, Mr. Kahraman has successfully closed out of counseling with his therapist, Dr. Capps-Conkle noting that he has made significant progress and has completed all of his goals.

Mr. Kahraman has an identified pediatrician for Dylan and Kenan that is close to his home and Mr. Kahraman is willing and able to continue Kenan's appointments with cardiology and endocrinology. Dylan and Kenan are currently enrolled in a homeschool program and this will be continued by Mr. Kahraman.

It is respectfully recommended that Dylan and Kenan Kahraman be placed in the physical custody of their father, Ahmet Kahraman.

**II. RECOMMENDATIONS:**

**A. AGENCY:**

It is respectfully recommended that Dylan and Kenan Kahraman remain a ward(s) of the court, committed to the care, custody and control of the Arizona Department of Child Safety.

It is respectfully recommended that Dylan and Kenan Kahraman be placed in the physical custody of their father, Ahmet Kahraman.

**B. CASE PLAN:**

It is respectfully recommended that Dylan and Kenan Kahraman remain a ward(s) of the court, committed to the care, custody and control of the Arizona Department of Child Safety.

**C. FINANCIAL:**

It is respectfully recommended that beginning (date) \_\_, the parents listed below be assessed the following amounts on a monthly basis per child as the contribution towards the cost of foster care:

(parent name) \_\_\_\_\_ be assessed \$ \_\_\_\_\_ monthly for each of the following children: \_\_\_\_\_

(parent name) \_\_\_\_\_ be assessed \$ \_\_\_\_\_ monthly for each of the following children: \_\_\_\_\_

(parent name) \_\_\_\_\_ be assessed \$ \_\_\_\_\_ monthly for each of the following children: \_\_\_\_\_

(parent name) \_\_\_\_\_ be assessed \$ \_\_\_\_\_ monthly for each of the following children: \_\_\_\_\_

(parent name) \_\_\_\_\_ be assessed \$ \_\_\_\_\_ monthly for each of the following children: \_\_\_\_\_

**D. REASONABLE EFFORTS FINDINGS:**

It is respectfully recommended that the Court find that the agency has made reasonable efforts in this case.

Respectfully Submitted:

Name/Title:  Madison Bell DCS Specialist

Page 2 **Addendum Report To Juvenile Court**  
**ARIZONA DEPARTMENT OF CHILD SAFETY**  
**Telephone Number: 480-656-9306**  
**Date: 8/4/20**

**Approved by:**   
**Name/Title: Mecca Temple DCS Program Supervisor**  
**ARIZONA DEPARTMENT OF CHILD SAFETY**  
**Date: 8/4/20**

**Case Name: KAHRAMAN, JESSICAID: 608484**

1 Original of the foregoing filed  
2 this 1<sup>st</sup> day of August, 2020, with:

3 Clerk of the Court  
4 Maricopa County Superior Court  
5 Juvenile Court Southeast Facility  
6 1810 South Lewis Street  
7 Mesa, AZ 85210

8 Copy of the foregoing hand-delivered  
9 this 1<sup>st</sup> day of August, 2020, to:

10 Honorable Cassie Woo  
11 Maricopa County Superior Court  
12 Juvenile Court Southeast Facility  
13 1810 South Lewis Street  
14 Mesa, AZ 85210

15 Copies of the foregoing electronically mailed  
16 this 1<sup>st</sup> day of August, 2020, to:

17 Bailiff: Susan.Whitaker@JBAZMC.Maricopa.Gov  
18 JA: Kimberly.Klein@JBAZMC.Maricopa.Gov

19 Kinda Johnson-Hurd, Esq.  
20 Kinda.Johnson-Hurd@Maricopa.Gov  
21 Guardian Ad Litem for the Child/ren

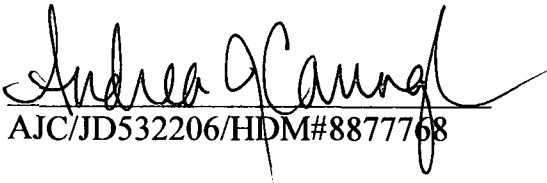
22 DeeAn Gillespie Strub, Esq.  
23 DGillespie@gillaw.com  
24 Attorney for Mother

25 Rachel Metelits, Esq.  
26 rachel.metelits@maricopa.gov OPASEFDisclosure@maricopa.gov  
27 Attorney for Father

28 Madison Bell  
madison.bell@azdcs.gov  
Case Manager

Carol Cooper  
Carol.Cooper@maricopacasa.org  
Court Appointed Special Advocate

1 Susan Stark  
2 Susan.Stark@maricopacasa.org  
3 Court Appointed Special Advocate

4   
5 AJC/JD532206/HDM#8877768  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28